

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT STOUD,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	
	:	
SUSQUEHANNA COUNTY,	:	NO. 3:17-CV-2183-MEM
	:	
Defendant	:	

MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS

Defendant, Susquehanna County, through its attorneys, Kreder Brooks Hailstone LLP, hereby requests the Court to extend the deadline to file dispositive motions to November 28, 2018, and cite the following reasons, therefore:

1. By Order dated November 13, 2018, the Court set various deadlines including the deadline for filing of Dispositive Motions for November 21, 2018.

2. Due to circumstances beyond his control, counsel for the Defendant will be unable to file a dispositive motion by that deadline.
3. Defendants request that the deadline for filing of Dispositive Motions be extended to November 28, 2018.
4. Plaintiff concurs in this request.
5. The requested extension will not unreasonably delay trial.

WHEREFORE, it is respectfully requested that the Court extend the deadline for the filing of Dispositive Motions to November 28, 2018.

KREDER BROOKS HAILSTONE LLP

By /s/A. James Hailstone  
A. James Hailstone  
Attorney for Defendant

CERTIFICATE OF CONCURRENCE

I, A. James Hailstone, hereby certify that I contacted Plaintiffs' counsel in accordance with the Local Rules to determine whether he would concur in the attached Motion. Plaintiffs' counsel concurs with the attached Motion.

KREDER BROOKS HAILSTONE LLP

220 Penn Avenue, Ste 200  
Scranton, PA 18503

/s/A. James Hailstone  
A. James Hailstone  
Attorney I.D. #80055  
Attorneys for Defendant

CERTIFICATE OF SERVICE

AND NOW, this 21<sup>st</sup> day of November, 2018, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Motion with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

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A. James Hailstone  
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